

486-07/PJG

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NOVOSHIP (UK) LIMITED, CALLY SHIPHOLDINGS
INC., VITAL SHIPPING CORPORATION, and
DAINFORD NAVIGATION INC.,

Plaintiffs,

- against -

WILMER RUPERTI, SEA PIONEER SHIPPING
CORPORATION, and PMI TRADING INC., JOHN DOE
(fictitious) and JOHN DOE INC. (fictitious),

Defendants.

07-CV- 9876 (DLC)

**NOTICE OF MOTION FOR
RENEWAL OF ORDER OF
ATTACHMENT PURSUANT
TO SUPPLEMENTAL
ADMIRALTY RULE B**

PLEASE TAKE NOTICE that pursuant to the direction of the Court at the hearing held on December 14, 2007, and upon the accompanying Memorandum of Law, the First Amended Verified Complaint filed on December 13, 2007, the Affidavit of Peter J. Gutowski dated December 19, 2007, and the exhibits attached thereto (including the Declaration of Michelle Jacqueline Linderman, the Declaration of Vladimar Petromsho Oskirko, and the Schultz affidavits), and all the pleadings filed and proceedings previously had herein,

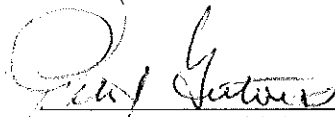
Plaintiffs Novoship (UK) Limited, Cally Shipholdings Inc., Vital Shipping Corporation and Dainford Navigation Inc. will move this Court before the Honorable Denise L. Cote, at the

United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be fixed by the Court, for a renewal of the order of attachment previously issued herein seizing all tangible and intangible property of Defendants, including but not limited to any property of Defendants as may be held, received or transferred in any of their names or for their benefit, at, moving through, or within the possession, custody or control of banking institutions and/or other institutions or such other garnishee(s) on whom a copy of the Process of Maritime Attachment and Garnishment may be served, up to the total amount of USD \$17,149,420, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's order at the hearing held on December 14, 2007, any opposing affidavits and answering memoranda shall be served by January 4, 2008, and any reply by January 11, 2008.

Dated: December 19, 2007
New York, NY

Respectfully submitted,



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